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February 24, 2022

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VIA E-MAIL

Honorable Judge Stewart D. Aaron
Southern District of New York
500 Pearl Street, Room 1970
New York, NY 10007

ENDORSEMENT: Requests GRANTED. The telephone conference scheduled for 2/25/22 at noon is canceled. The deposition deadline is extended until 4/15/22. The deadline for completion of fact discovery is extended to 5/15/22. The parties shall submit a joint letter regarding the status of discovery no later than Monday, 4/18/2022. Any further extension of discovery deadlines will be granted only in exigent circumstances and then only for a limited purpose.

SO ORDERED.

Dated: February 24, 2022



Re: **Song et al c. TH NYC Restaurant 1 LLC et al**
Case No. 1:20-cv-08624

Motion to adjourn the conference and for an extension of deposition deadline

Dear Hon. Judge Aaron,

This firm represents Plaintiffs in the above-referenced matter. I wrote with Defendants' counsel's consent. Plaintiffs request the Court to adjourn the conference set on February 25, 2022 at 12 pm *sim sine*. Plaintiffs further request an extension for deposition deadline, which is March 15, 2022 for 30 days to April 15, 2022 for the reasons below. Plaintiffs are aware of your honor's individual rule which requires 72 hours in advance of the scheduled proceeding. The undersigned regret for the non-compliance.

On December 21, 2021, the Court ordered parties to submit a joint letter concerning the discovery status by February 22, 2022.

On February 22, 2022, Defendants emailed me the proposed status report, which is subsequently filed with the Court. ECF Dkt. No. 39. However, the undersigned is in a deposition on that day and cannot get back to them.

On February 23, 2022, Plaintiffs served their discovery responses along with document production to Defendants' counsel. Thus, parties have resolved the outstanding discovery dispute amount themselves. Parties reserve the right to challenge the deficiency concerning the written discovery responses.

Meanwhile, Defendants have conveyed settlement offer to Plaintiff on this day. On October 28, 2021, the Court ordered the deposition to be completed by March 15, 2022. In

light of the settlement discussion and the delay in written discovery. Parties jointly request the Court to extend the deposition deadline to April 15, 2022. The fact discovery cut of day is May 15, 2022, this should not affect the proceeding of this matter.

Thank you for Your Honor's assistance with this matter.

/s/ Shan Zhu

Shan Zhu, Esq.

Counsel for Plaintiffs